

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

ROSY GIRON DE REYES, *et al.*,

*Plaintiffs,*

v.

WAPLES MOBILE HOME PARK  
LIMITED PARTNERSHIP, *et al.*,

*Defendants.*

Civil No.: 1:16cv00563-TSE-TCB

**CONSENT MOTION TO EXTEND DEADLINE FOR OBJECTIONS**

Plaintiffs Rosy Giron de Reyes, Jose Dagoberto Reyes, Felix Alexis Bolanos, Ruth Rivas, Yovana Jaldin Solis, Esteban Ruben Moya Yrapura, Rosa Elena Amaya, and Herbert David Saravia Cruz (“Plaintiffs”), and Defendants Waples Mobile Home Park Limited Partnership, Waples Project Limited Partnership, and A. J. Dwoskin & Associates, Inc. (“Defendants”), by counsel, respectfully submit this Consent Motion to Extend Deadline for Objections.

On July 28, 2016, the Court issued an Order (Dkt. 35) which, among other things, set the final pretrial conference date and directed that “Objections to exhibits must be filed within 10 days after the conference; otherwise the exhibits shall stand admitted in evidence.” On December 7, 2016, the Court issued an Order (Dkt. 125), which rescheduled the final pretrial conference for February 2, 2017 and reiterated that “Objections to exhibits must be filed within 10 days after the conference; otherwise the exhibits shall stand admitted in evidence.”

On January 24, the Court issued an Order (Dkt. 164) rescheduling the final pretrial conference for January 27. On January 26, the Court issued an Order (Dkt. 170) rescheduling the final pretrial conference for February 17 to coincide with oral argument on pending motions.

On February 17, the Court held oral argument on the parties' cross-motions for summary judgment, but did not hold the final pretrial conference. Instead, the Court indicated it would call the parties back to discuss pretrial issues, if necessary.

Finally, on February 21, the Court issued an Order (Dkt. 185) denying as moot in part and taking under advisement in part the cross-motions for summary judgment and noting: "If necessary, a further order will issue to schedule a trial date and set deadlines for any appropriate pre-trial pleadings."

The parties respectfully request permission to file objections to exhibits no later than 10 days after the Final Pretrial Conference or, alternatively, if there is no Final Pretrial Conference, 10 days after the Court sets the trial and pretrial deadlines.

A proposed Consent Order is attached.

DATED February 27, 2017.

Respectfully submitted,

/s/ Paul Brinkman

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 27th day of February, 2017, I filed the foregoing Consent Motion to Extend Deadline for Objections electronically with the Clerk of the Court using the ECF system, and caused to be served by electronic mail a copy of the foregoing document upon the following parties:

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